

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

CRYSTAL BOLDUC,

Plaintiff,

vs.

AMAZON.COM INC.,

Defendant.

Civil Action No. 4:22-cv-615-ALM

**AGREED JOINT MOTION REGARDING COMPLAINT AMENDMENT AND
ANSWER DEADLINE EXTENSION**

COMES NOW, Plaintiff Crystal Bolduc (“Bolduc”) and Defendant Amazon.com, Inc. (“Amazon”)¹ and file this Agreed Joint Motion Regarding Complaint Amendment and Answer Deadline Extension and in support would respectfully show the Court as follows.

- After conferring, the Parties have agreed that Plaintiff will file an amended complaint by no later than December 16, 2022.
- Defendant has agreed and hereby stipulates that this amended complaint will not take the place of Plaintiff’s right to one amendment as a matter of course under FRCP 15(a)(1) and Defendant will not object to Plaintiff filing another amended complaint as a matter of course if Plaintiff elects to do so.
- The Parties likewise agree that Defendant’s deadline to file an Answer or response to this first amended complaint should be January 31, 2023.²

¹ Defendant files this Motion without prejudice to and with express reservation of all rights to contest jurisdiction in this matter, both personal and subject-matter.

² Defendant’s current deadline to file a response or answer to the Complaint is December 16, 2022. If the Plaintiff files her amended complaint on December 16, 2022, this requested extension would be an extension of 32 days beyond the 14 days provided under the rules for responding to amended complaints.

- This agreed deadline extension is reasonable and for good cause in light of the upcoming holidays and the Parties' good faith conferrals and attempts to narrow the issues for the Court.

In light of the foregoing, the Parties jointly and respectfully request, pursuant to Federal Rule of Civil Procedure 6.1(b)(1), that the Court grant this Motion and extend Defendant's Answer deadline to January 31, 2023.

Dated: December 14, 2022

Respectfully Submitted,

/s/ Jonathan F. Mitchell

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**COUNSEL FOR DEFENDANT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure and this Court's CM/ECF filing system on December 14, 2022.

/s/ Angela C. Zambrano
Angela C. Zambrano